

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Azar Garayev

Plaintiff,

vs.

**CITY OF CHICAGO, CHICAGO POLICE ,
OFFICERS, Allen Huang Star #13835, Kevin Lopez,
Star #18070, and Eric Duron, Star # 1497
Defendants.**

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) **Case No. 25 C 4717**
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NOTICE OF REMOVAL

Defendant City of Chicago, by one of its attorneys, Leslie Wiesen, Assistant Corporation Counsel III of the City of Chicago, respectfully request(s) removal of the above-entitled action to this Court, pursuant to 28 U.S.C. §1441(a) and §1446 (a), based on the following grounds

1. Defendant **City of Chicago** was named as defendants in a civil action filed in the Circuit Court of Cook County of the State of Illinois, case number **25 L 004156**, entitled **Azar Garayev v. City of Chicago, et al.**

2. The Complaint was filed on **March 27, 2025**. Defendant **City of Chicago** was served on **April 2, 2025**. See Summons and Complaint attached hereto as Exhibit A.

3. Plaintiff brings this action pursuant to 42 U.S.C. § 1983 and Illinois common law. In Count I and II, Plaintiff alleges that the Defendants violated the 4th Amendment of the United States Constitution by unlawful, unwanted, and harmful handcuffing, touching, and handling of Plaintiff by the Defendants, constituting batteries and excessive force, was without lawful basis, reasonable suspicion, probable cause or warrant, or any recognized exceptions thereto, or justification or excuse, unlawful search and seizure and was thus unreasonable.

4. Based on the allegations of the complaint and for reasons set forth above, **Defendant City of Chicago** is entitled to remove this action to this court, pursuant to 28 U.S.C. §1441(a).

WHEREFORE, **Defendant City of Chicago** respectfully request that the above-entitled action now pending in the Circuit Court of Cook County in the State of Illinois, case number **25 L 0014156**, be removed therefrom to this Court.

Respectfully submitted,

/s/ Leslie Wiesen

Leslie Wiesen

Assistant Corporation Counsel III

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